

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Revision of the Commission's Rules)	
To Ensure Compatibility with)	CC Docket No. 94-102
Enhanced 911 Emergency Calling Systems)	

**THC OF ORLANDO, INC., THC OF HOUSTON, INC., THC OF MELBOURNE, INC.,
THC OF TAMPA, INC., THC OF SAN DIEGO, INC.
REPORT ON IMPLEMENTATION OF WIRELESS E911
PHASE II AUTOMATIC LOCATION IDENTIFICATION**

Pursuant to Section 20.18(i) of the Commission's rules,¹ the direction of the September 14, 2000 Public Notice of the Wireless Telecommunications Bureau,² and in response to a letter from the Commission requesting the same, THC of Orlando, Inc., THC of Houston, Inc., THC of Melbourne, Inc., THC of Tampa, Inc. and THC of San Diego, Inc.³ ("THC") hereby submits this report on their implementation plans for providing Phase II Enhanced 911 ("E911") Services.

INTRODUCTION

With the exception of THC of San Diego, Inc., each of the PCS markets for which licenses are held has yet to be constructed and made operational. As such, THC has no further information

¹ See 47 C.F.R. § 20.18(i).

² See *Public Notice*, "Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification," DA 00-2099, released September 14, 2000 ("*E911 Public Notice*").

³ In the Commission's letter requesting additional information, THC of San Diego, Inc. is referred to by the name "San Diego PCS, LLC." San Diego PCS, LLC has assigned station KNLG655 to THC of San Diego, Inc. This transaction was filed with the Commission and approved. Additionally, the Commission sent a letter to TeleCorp PCS, LLC. TeleCorp PCS, LLC is an affiliate of TeleCorp PCS, Inc. TeleCorp PCS, Inc. has filed an E911 report and supplement that covers TeleCorp PCS, LLC. See November 9, 2000 Report by TeleCorp PCS, Inc. and January 2, 2001 Supplemental Report by TeleCorp PCS, Inc.

to provide the Commission about Phase II E911 implementation. As each of these markets is made operational, THC will endeavor to ensure that each system is compliant with the E911 requirements. Further, at that time, THC will be in a position to make a determination about whether a network or handset-based solution will best serve its customers.

THC of San Diego, Inc. is operational but purely serves roaming customers. THC of San Diego provides roaming capabilities for the SunCom network. SunCom is the PCS network that is affiliated with AT&T Wireless and utilizes time division multiple access ("TDMA") technology. As such, THC has cooperated extensively with AT&T Wireless in attempting to fulfill the goals of the Commission's mandate for providing location information to its subscribers that dial "9-1-1" in an emergency situation.

On November 30, 2000, AT&T announced that it is forming a strategic alliance with NTT DoCoMo, Japan's leading mobile communications company, to develop the next generation of mobile multimedia services on a global-standard, high-speed wireless network.^{4/} To speed the introduction of these new data services, AT&T has informed the Commission it will overlay a GSM (Global System for Mobile Communications)/GPRS (General Packet Radio Service) platform to its existing nationwide TDMA network.

THC must be compatible with AT&T's system. As such, THC will also be undergoing a transition from the TDMA to GSM air interface. As AT&T has informed the Commission previously, this change will give THC's network higher speed data capabilities and its customers a wider array of mobile devices from the world's GSM vendors. Nevertheless, as the Commission doubtless recognizes, the expected transition -- falling at the same time as the Phase

^{4/} See Press Release, AT&T and NTT DoCoMo Announce Strategic Wireless Alliance

II report was due -- seriously complicated THC's plans regarding the most appropriate ALI technology. Until the decision about the DoCoMo transaction and the air interface change was final and announced to the public, THC was not in a position to choose between the various Phase II technologies.

THC is fully committed to enhancing the safety of its subscribers and the communities it serves and, therefore, it continues to investigate every possible location service technology. Moreover, THC has every intention of complying with the FCC's Phase II implementation deadlines. After more than a year of testing and analysis, THC finds itself in agreement with most other carriers and public safety agencies that, ultimately, the best Phase II technology is handset-based. Handset technology has demonstrated the potential to be far more accurate than network-overlay solutions and it is considerably more adaptable to changing conditions. Unfortunately, however, the aggressive nature of the Commission's schedule for handset deployment has made it necessary for carriers to consider other, less optimal, interim solutions. As described below, THC has developed a Phase II implementation plan that it believes comes as close to meeting the Commission's requirements as any other proposed solution.

I. GSM Network

As noted above, THC's decision to change its air interface to GSM was based on its determination that such action would expedite the provision of the next generation of advanced wireless services to customers, in accordance with the Commission's oft-stated goals.^{5/} For

(...Continued)
(November 30, 2000).

^{5/} See, e.g., News Release, Press Statement of Chairman William E. Kennard on Spectrum Requirements for Advanced Wireless Services (rel. October 13, 2000) ("We look forward to working with the Executive Branch in our respective spectrum management roles to ensure that

purposes of E911 Phase II compliance, THC intends to deploy throughout its GSM network Enhanced Observed Time Difference of Arrival (“E-OTD”) technology. E-OTD is a hybrid handset and network-based solution, which the Commission recently approved through a waiver to VoiceStream Wireless Corporation. As the Commission noted in that waiver order, E-OTD may be the only viable solution for GSM carriers.^{6/}

THC contemplates that it will make E-OTD available in its GSM network immediately upon its air interface change out. Specifically, THC has made requests to its vendors that the GSM infrastructure be E-OTD equipped when installed. THC intends to apply for any waivers that might be necessary when it has more information on its change-out schedule and the performance and accuracy of the E-OTD technology.

II. TDMA Network

For its pre-existing TDMA network, as noted in its November 9th Report, THC is investigating the use of a network-based solution. Thus, use of a network-based technology will be THC’s ALI solution for TDMA. If such a technology solution does not achieve necessary compliance with the FCC’s mandated requirements, THC will either seek a waiver of the requirements or notify the Commission of a change in its technology choice within 30 days of the change.

(...Continued)

the American public has widespread and timely access to the next generation of advanced wireless services.”); News Release, Industry Settlement Advances Standards Process for Third Generation Wireless Services (rel. March 26, 1999) (Chairman Kennard noted that settlement of a patent dispute “will allow for a speedier deployment of exciting wireless broadband services for the benefit of consumers.”).

^{6/} See Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Fourth Memorandum Opinion and Order*, FCC 00-326, at ¶ 56 (rel. Sept. 8, 2000).

III. TESTING AND VERIFICATION

All testing and verification of location technology to be utilized by THC for its GSM and TDMA ALI systems will be done in accordance with the principles found in OET Bulletin 71.

IV. EXISTING HANDSETS AND LOCATION OF NON-COMPATIBLE HANDSETS

Because THC will be utilizing a network-based solution for its TDMA network, existing handsets will be located by its system and there will not be an issue with non-compatible legacy handsets. Additionally, for its new GSM network, all handsets activated on this new network will be compatible with the handset-based location technology. Therefore, the GSM network will not have any preexisting handsets, nor will it have any non-compatible handsets to accommodate.

CONCLUSION

THC intends to continue its work with vendors to identify the best Phase II solution possible for both its GSM and TDMA networks. At this point, THC believes that the use of a handset-based solution for its GSM network and a network-based solution for its TDMA network is the approach that will lead to the most effective location network for its subscribers.

Respectfully submitted,

THC OF ORLANDO, INC., THC OF HOUSTON,
INC., THC OF MELBOURNE, INC., THC OF
TAMPA, INC., THC OF SAN DIEGO, INC.

/s/ Thomas Sullivan

Thomas Sullivan
President
1010 N. Glebe Road, Suite 800
Arlington, VA 22201
(703) 236-1100

January 23, 2001